

RUSSELL LOW, ESQ. RLL-4745

LOW & LOW, LLC.

Attorneys at Law

505 Main Street

Hackensack, NJ 07601

(201) 343-4040

Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

Joe L. Gregory, Jr. & April
Gregory : CASE NO. 19-32926

Debtor : HONORABLE STACEY L. MEISEL

**ATTORNEY'S RESPONSE TO NOTICE OF MOTION TO VACATE AUTOMATIC
STAY**

I, Russell L. Low, Esq. hereby certify the following:

1. I, Russell L. Low, Esq. represent the debtors Joe L. Gregory, Jr. & April Gregory in this bankruptcy proceeding.
2. A Notice of Motion to Vacate Automatic Stay was entered on September 3, 2021.
3. The debtors are in arrears from June 2021 to September 2021.
4. My legal staff tried reaching the debtor to resolve this motion and were unsuccessful in getting a response.
5. Therefore, more time is needed to reach the debtors in hopes of resolving this motion for relief.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: October 6, 2021

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor